

US EPA ARCHIVE DOCUMENT

Comments on Coronado

EPA HQ - No comments

EPA Region -

See attached doc dated Nov. 17, 2009

State -

From: "Michael J. Johnson" <mjjohnson@azwater.gov>
To: James Kohler/DC/USEPA/US@EPA, John Schofield/R9/USEPA/US@EPA, 'Mel P.Bunkers' <Bunkers.Mel@azdeq.gov>
Cc: Stephen Hoffman/DC/USEPA/US@EPA, Ravi Murthy <rmurthy@azwater.gov>, "Karen L. Smith" <klsmith@azwater.gov>
Date: 11/09/2009 11:40 AM
Subject: RE: Comment Request on EPA's Draft Coal Ash Impoundment Assessment Reports

Jim,

Thanks for the opportunity to review the reports. ADWR has no direct comments on the reports themselves. Please be advised that following our next inspection of the state-regulated dam at the Apache site (tentatively scheduled for December 2009), we will review the current earth fissure mitigation plan in light of more recent findings related to fissure monitoring and identification at other Arizona damsites.

Mike

Michael Johnson, Ph.D., P.E.
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(602) 771-8659
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Company -

See attached doc dated Nov. 12, 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105**

November 17, 2009

MEMORANDUM

SUBJECT: Comments to Dam Assessment Report – *Draft*, Project #01-381, SRP Coronado Generating Station Evaporation Pond Dam, Apache County, Arizona, prepared by GZA Environmental, Inc. dated October 9, 2009

FROM: John Schofield, RCRA Enforcement Office

TO: James Kohler, P.E., Office of Resource Conservation of Recovery

The following are EPA Region IX, RCRA Enforcement Office comments to the referenced report:

1. Page 17, Emergency Warning System. Recommend that title of this section be changed to "Emergency Action Plan."
2. Page 17, Emergency Warning System. Check figure references. The referenced figures should be Figures 8 and 9, and not Figures 7 and 8, as listed.
3. Page 17, Emergency Warning System. Recommend adding discussion on Hazard Potential Rating and/or reference discussion found at Page 7, Section 1.2.7. Hazard Potential Classification. Also, GZA Environmental, Inc. (GZA) should include any calculations performed by GZA to verify inundation information. What is the inundation depth at the Access Road?



Delivering More Than Power™

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November 12, 2009

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

Re: Response to the request for comments on the Draft Report of the Coal Combustion Residuals impoundment at the Salt River Project Coronado Generating Station under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601-9675.

Mr. Stephen Hoffman:

Thank you for providing Salt River Project Agricultural Improvement and Power District (SRP) the opportunity to provide comments on the draft report prepared by GZA GeoEnvironmental, Inc. (GZA) for the Coronado Generating Station (CGS) facility based on the investigation conducted September 9-10, 2009 by the United States Environmental Protection Agency (USEPA) and GZA to assess the structural stability of the coal combustion residual impoundment at CGS. The report is well written and SRP has only few minor comments. SRP's specific suggested changes in the report text and rationale for the corrections are provided in Attachment A to this letter.

If you have any questions about the comments on the report please do not hesitate to call Prabhat Bhargava of my staff at (928) 337-5506.

Sincerely,

A handwritten signature in black ink that reads "William D. Beck".

William D. Beck, Plant Manager
SRP / Coronado Generating Station

Attachments

cc: Glen Reeves
Daniel Casiraro
Prabhat Bhargava
Kent Liesemeyer
Karilee Ramaley
File: LOC 5-2-7.1

ATTACHMENT A

**Suggested Changes in Task 3 Dam Assessment Report –Draft
Project #0-381,
SRP Coronado Generating Station Evaporation Pond Dam**

The GZA draft report dated October 9, 2009 (GZA File No. 01.0170142.10) is well written and researched. In general, the report appears to be an accurate account based on the site specific inspection of the Evaporation Dam at the Salt River Project, Coronado Generating Station (SRP/CGS) facility on September 9 and 10, 2009. However, there are number of suggested corrections / changes that SRP/CGS requests:

Dam Height: Replace Structural Height of 53 feet with 61.3 feet (maximum or embankment height)
Executive Summary (page i, 2nd paragraph)
Section 1.2.4 (page 3, 3rd paragraph)
Section 1.2.6 (page 7, 1st paragraph)
Section 1.3.4 Corrections to General Elevations (Top of Dam minus Low Point should equal 61.3 feet)
Appendix C:

CCW Impoundment Inspection (EPA Form xxxx-xxx, Jan 09) Page 3

Dam Safety Inspection Checklist (v.3.1) Page 1

Reason: The “Statutory Dam Height” of 53 feet from Arizona Department of Water Resources (ADWR) records is the distance from the lowest point on the toe of the dam to the spillway crest. The total freeboard of 8.3 feet must be added to obtain a height to the crest of the dam which is 61.3 feet.

Settling ponds: Replace “The northern of the two settling ponds is reportedly no longer operational. The southern of the two settling ponds is operational” with “Neither settling pond is operational”

Section 1.2.5 (page 6, last paragraph on page)

Reason: SRP/CGS was not discharging into the settling ponds at the time of the GZA inspection and has no plans to discharge to these structures in the future.

Settling ponds: Replace “adjust the elevation of the discharge to limit” with “maintained”

Section 1.2.5 (page 7, 1st paragraph on page)

Reason: SRP/CGS designed the settling pond for a capacity less than 50 acre-feet (not actively adjusted).

Settling ponds: Replace “it appeared that two main settling ponds used by SRP/CGS” with “it appeared that two main settling ponds are no longer used by SRP/CGS”

Section 1.3.1 (page 8, 4th paragraph)

Reason: SRP/CGS was not discharging into the settling ponds at the time of the GZA inspection and has no plans to discharge to these structures in the future.

Vegetation: Replace “Deep-rooted vegetation that had been removed from the dam had been deposited in small piles on top of the dam, and” with “Dead vegetation”

Section 2.1.3 (page 14, 1st paragraph):

Reason: This vegetation was not deep-rooted and these dead shrubs remained in the place that they grew (not removed from elsewhere).

Typographical error: Replace “great” with “greater”

Section 2.5 (page 18, last paragraph on page)

Reason: Typographical error.